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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;  
LICETH DEMHA-SANTIAGO; JUAN  
DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

Defendants.

ALL RELATED MATTERS

CASE NO.: 2:18-CV-01241-JCM-NJK

**STIPULATION AND ORDER REGARDING  
PLAINTIFF'S MOTIONS *IN LIMINE***

IT IS HEREBY STIPULATED by Plaintiff, SONALOLITA WILSON, by and through her counsel of record, BRADLEY S. MAINOR, ESQ., JOSEPH J. WIRTH, ESQ., and ASH MARIE BLACKBURN, ESQ., of MAINOR WIRTH, LLP, Defendant, UNITED STATES OF AMERICA, by and through its counsel of record, R. THOMAS COLONNA, ESQ., and Defendants, LICETH DEMHA-SANTIAGO and JUAN DEMHA, by and through their counsel of record, STEVEN T. JAFFEE, ESQ. and JAN K. TOMASIK, ESQ. of HALL JAFFE & CLAYTON, LLP, that the following information be excluded and/or admitted at trial:

1. The parties agree that Plaintiff's treating physicians are permitted to testify as to

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causation, diagnosis, prognosis, future treatment and extent of disability without a formal report. Plaintiff's treating physicians will be limited to testimony as to opinions formed during the course of treatment or testimony based upon review of medical records or reports during the course of treatment.

2. The parties agree that Plaintiff may admit a relevant Life Expectancy Table published by the U.S. Department of Health and Human Services at the time of trial for the purpose of evaluating only Plaintiff's claim for future pain and suffering and not Plaintiff's future medical expenses, which have been stricken.
3. The parties agree to exclude reference to or evidence of a 2013 motor vehicle collision, wherein Plaintiff did not sustain injury or seek medical treatment.
4. Defendants stipulate to the foundation and authenticity of Plaintiff's medical records and medical billing, subject to appropriate redactions.
5. Plaintiff stipulates to the foundation and authenticity of Plaintiff's prior medical records for the following dates of service: 11/9/2014; 11/12/2014; 2/4/2015; 2/22/2016.
6. Plaintiff will not call Robert Simmons as an expert, or otherwise, at trial.
7. The parties agree to exclude references to or evidence of any settlement offers, discussions, or negotiations between the parties.
8. The parties agree to exclude references to or evidence of insurance information on behalf of any party.

DATED this 10th day of March, 2023.

DATED this 10th day of March, 2023.

/s/ Ash Marie Blackburn  
 BRADLEY S. MAINOR, ESQ.  
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 ASH MARIE BLACKBURN, ESQ.  
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/s/ R. Thomas Colonna  
 PATRICK A. ROSE, ESQ.  
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*Counsel for Defendant United States of America*

*Re: Wilson v. United States of America*  
Stipulation and Order re. Plaintiff's Motions in Limine

DATED this 10<sup>th</sup> day of March 2023.

**HALL JAFFE & CLAYTON, LLP**

*/s/ Jan Tomasik*

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STEVEN JAFFE, ESQ.

Nevada Bar No. 7035

JAN K. TOMASIK, ESQ.

Nevada Bar No. 15104

7425 Peak Drive

Las Vegas, NV 89128-4438

*Counsel for Defendants Demha-Santiago and Juan Demha*

**ORDER**

IT IS SO ORDERED March 13, 2023.

  
**UNITED STATES DISTRICT JUDGE**

*Respectfully Submitted by:*

**MAINOR WIRTH, LLP**

*/s/ Ash Marie Blackburn*

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ASH MARIE BLACKBURN, ESQ.

Nevada Bar No. 14712

*Counsel for Plaintiff*

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